

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

CORRIE SINGLETON

CASE NUMBER: 22CR574

UNDER SEAL

FILED

11/1/2022

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

Count One

On or about October 31, 2022, at Lansing, in the Northern District of Illinois, Eastern Division, the defendant(s) violated:

Code Section

Title 18, United States Code, Section 1951(a) and Section 2

Offense Description

obstructed, delayed, and affected commerce, and the movement of articles and commodities in commerce, by robbery, as "commerce" and "robbery" are defined in Title 18, United States Code, Section 1951(b), and committed and threatened physical violence to a person and property in furtherance of a plan and purpose to do something in violation of Title 18, United States Code, Section 1951(a)

Count Two

On or about October 31, 2022, at Lansing, in the Northern District of Illinois, Eastern Division, the defendant(s) violated:

Code Section

Title 18, United States Code, Section 2113(b) and (d), and Section 2

Offense Description

did take and carry away, with the intent to steal, money exceeding \$1,000 in value belonging to, and in the care, custody, control, management, and possession of Bank A, namely, the United States currency stored in the Bank A ATM located at 16767 Torrence Avenue, Lansing, Illinois, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and in committing such offense, assaulted a person, namely, Brink's Courier A

This criminal complaint is based upon these facts:

X Continued on the attached sheet.



Scott Erthal

Special Agent, Federal Bureau of Investigation (FBI)

Pursuant to Fed. R. Crim. P. 4.1, this complaint is presented by reliable electronic means. The above-named agent provided a sworn statement attesting to the truth of the foregoing affidavit by telephone.

Date: November 1, 2022 11:30am



Judge's signature

City and state: Chicago, Illinois

JEFFREY COLE, U.S. Magistrate Judge
Printed name and title

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

AFFIDAVIT

I, SCOTT ERTHAL, being duly sworn, state as follows:

INTRODUCTION AND AFFIANT BACKGROUND

1. I am a Special Agent with the Federal Bureau of Investigation (FBI) and have been so employed since approximately January 2019. My current responsibilities include the investigation of violent crimes, including, among others, kidnapping, bank robbery, violations of the Hobbs Act, and the apprehension of violent fugitives.

2. This affidavit is submitted in support of a criminal complaint alleging that CORRIE SINGLETON has violated Title 18, United States Code, Section 1951(a) (Hobbs Act robbery); Title 18, United States Code, Section 2113(b) and (d) (theft of over \$1,000 from a federally insured bank and assaulting another person during the commission of the offense); and Title 18, United States Code, Section 2 (aiding and abetting the foregoing offenses). Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint charging SINGLETON with Hobbs Act robbery and bank theft, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that the defendant committed the offenses alleged in the complaint.

3. The statements in this affidavit are based on my personal knowledge, interviews of witnesses, review of still shots from security video and on information I have received from other law enforcement personnel and from persons with knowledge regarding relevant facts, as well as my training and experience and the training and experience of other law enforcement officers with whom I have consulted.

FACTS SUPPORTING PROBABLE CAUSE

4. According to Lansing Police Department ("LPD") reports, on or about October 31, 2022, at approximately 10:46 a.m., three black males (one later identified, by his own admission to initial responding officers and to me during a recorded interview, as CORRIE SINGLETON) conducted an armed robbery of a Bank A ATM and a Brink's armored vehicle in the area of 16767 Torrence Avenue in Lansing, Illinois. Following the robbery, when law enforcement attempted to conduct a traffic stop on the Dodge Charger used during the robbery, the Charger sped away before crashing. After the crash, all three occupants of the Charger attempted to flee from law enforcement. Only one of the individuals successfully escaped, but SINGLETON, who was in the driver's seat of the Charger, was arrested, along with another suspect later determined to be a juvenile.

5. According to records from Brink's, the robbers took approximately \$900,000 from the armored truck. An approximate value of the money taken from the Bank A ATM has not yet been ascertained. My own investigation and preliminary

information provided by bank employees confirmed that Bank A's deposits were insured by the Federal Deposit Insurance Corporation at the time of the offenses.

Interview of Brink's Courier A

6. FBI agents responded to the scene of the robbery and interviewed the Brink's armored courier (the "Brink's Courier A"). Brink's Courier A stated the following to FBI agents, in sum or substance:

a. On or about October 31, 2022, at approximately 10:46 a.m., Brink's Courier A went to Bank A, located at 16767 Torrence Avenue in Lansing, Illinois, and pulled in front of the ATMs. Brink's Courier A went to the mid-section of the Brink's truck and cut the bands on the currency and organized the currency to be used during his/her stop at the Bank A. Brink's Courier A then serviced the south ATM. As Brink's Courier A was servicing the south ATM, Brink's Courier A noticed a white Dodge Charger behind the Brink's truck. The Dodge Charger backed into a parking spot at the bank.

b. Brink's Courier A then began working to service the north ATM. As Brink's Courier A opened the north ATM, an unknown vehicle used the south ATM. As the unknown vehicle left, the white Dodge Charger pulled up next to the Brink's truck. Three unknown black males exited the Dodge Charger and began to yell at Brink's Courier A. Brink's Courier A turned around and saw one of the three robbers with a handgun. Brink's Courier A was ordered not to move. Brink's Courier A put his/her hands up and one of the robbers took his/her firearm from his/her belt. The robbers demanded money from Brink's Courier A and took the Brink's bag that

Brink's Courier A was going to use to refill the ATM from his/her possession. The robbers also removed cassettes filled with cash from the ATM.

c. After removing an unknown quantity of cash¹ from the Bank A ATM, the robbers then dragged Brink's Courier A to the Brink's truck and told Brink's Courier A to open the truck. Brink's Courier A opened the truck with his/her Brink's key fob. One of the robbers looked inside the truck and another robber, who was wearing a grey hooded sweatshirt, made Brink's Courier A open the inner truck door with his/her fingerprint. The robbers pushed Brink's Courier A inside the truck. Brink's Courier A handed the money, which was in colored, sealed plastic bags, to the robbers. Brink's Courier A remained in the truck while the robbers fled back to the Dodge Charger.

d. Brink's Courier A described the robbers as three black males. Robber #1 was wearing a grey hooded sweatshirt, average build, approximately 5'5" to 5'7" tall, wearing a shiny black-gaiter style mask, dark-colored pants, armed with a handgun. Brink's Courier A stated Robber #1 took his/her firearm during the offense. Robber #2 was approximately 6'0" tall, average build, dark-color hooded sweatshirt, and dark-colored pants. Brink's Courier A stated that Robber #2 held a gun to his/her head but s/he was not sure if Robber #2 had his own gun or if he was using the gun belonging to Brink's Courier A. Robber #3 was wearing a dark-color

¹ According to Brink's Courier A, who regularly services the Bank A ATMs, the ATM generally has between \$60,000 and \$100,000 left in the cassettes at the time of servicing. The robbers removed all of the cassettes during this incident.

hooded sweatshirt. Brink's Courier A could provide no further details about Robber #3.

7. Personnel from Brink's provided law enforcement with an approximate total loss of \$900,000 from the robbery of the Brink's armored vehicle.

Investigation by the Lansing Police Department

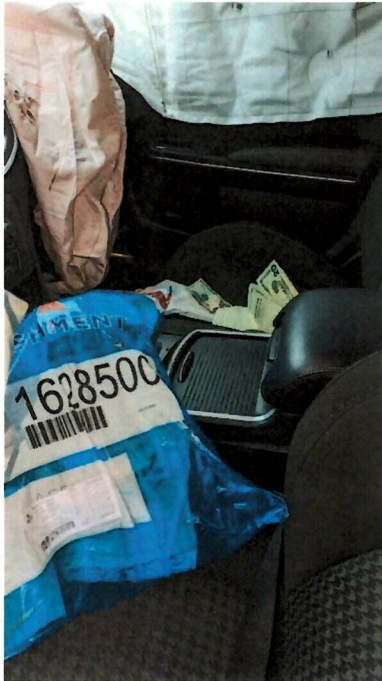
8. According to my review of preliminary Lansing Police Department reports, as well as my conversations with Lansing Police Department officers who were involved in the investigation and other individuals with personal knowledge of the relevant facts, I know the following:

a. Officers of the Lansing Police Department responded to Bank A, located at 16767 Torrence Avenue in Lansing, Illinois. Dispatch received a 911 call that indicated that a white Dodge Charger was used in the robbery and was travelling southbound on Torrence Avenue. Dispatch then advised officers that the offending vehicle was a white Dodge Charger that was fleeing southbound on Torrence Avenue. Lansing Police officers located a matching vehicle travelling southbound on Torrence Avenue at or around 170th Street. Lansing Police officers attempted to stop the vehicle utilizing their emergency lights and sirens, but the vehicle fled southbound before colliding with another vehicle and crashing into the wall of the Interstate 80 westbound entrance ramp.

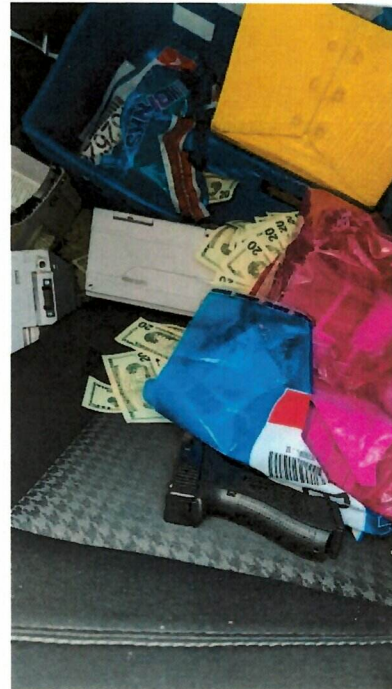
b. Dash-camera footage from a Lansing Police vehicle showed an individual who was wearing a dark-colored sweatshirt, jeans, and white sneakers (later identified after he was taken into custody as SINGLETON based on his own

admission to Lansing Police officers) exit the driver's seat of the crashed Dodge Charger. Officers then observed Individual A exit the driver's seat after SINGLETON and Individual B exit the back driver's seat of the vehicle. Both the driver's side door and the rear driver's side door were left open. Lansing Police officers pursued SINGLETON on foot and arrested him after he jumped over a concrete wall of the ramp onto a median of the expressway. Lansing Police officers also pursued Individual A, who jumped from the freeway to the ground below and was able to evade apprehension. Lansing Police officers pursued Individual B and arrested him on the on-ramp. Individual B was later determined to be a juvenile and is still in the hospital receiving treatment as of the filing of this affidavit.

c. Law enforcement did not search the vehicle onsite due to its location. Consistent with law-enforcement policy authorizing the vehicle to be impounded, the vehicle was towed from the scene to the Federal Bureau of Investigation office to be inventoried and searched later. Before moving it from the scene, several preliminary photographs were taken from the exterior. Through the open driver's side doors, inside the vehicle, Brink's bags with bundles of U.S. currency were observed along with loose bills. Additionally, a firearm was observed on the back seat. Two of those photographs are below and depict the Brink's bags with U.S. currency and loose cash, along with the handle of a firearm plainly visible in the rear seat of the car:



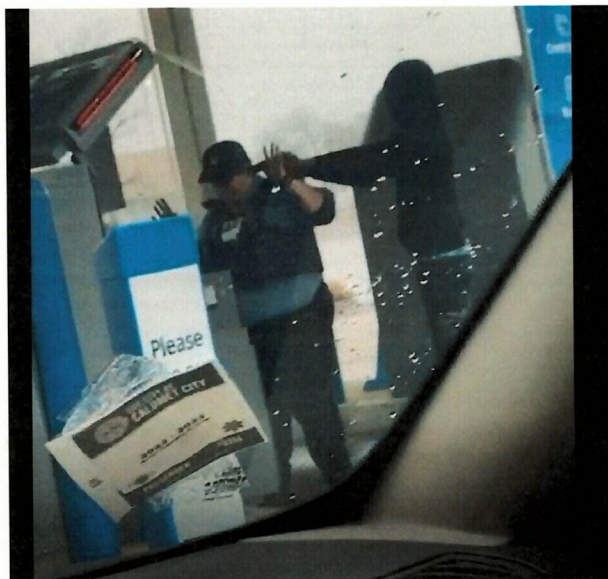
Front Seat



Rear Seat

9. According to Lansing Police Department officers, following his arrest, SINGLETON was transported back to Bank A, where Brink's Courier A positively identified SINGLETON by his clothing (which, as noted above, consisted of a dark-colored sweatshirt, jeans, and white sneakers) as being consistent with what she remembered one of the robbers wearing. SINGLETON and Individual B were both transported to local hospitals for evaluation following the car crash.

10. On or about October 31, 2022, within hours of the robbery, Witness A, who reported that s/he was in the parking lot of Bank A during the robbery, contacted law enforcement and provided law enforcement with a short cell-phone video showing a black male in a black-hooded sweatshirt holding a gun to Brink's Courier A. Below is a still image of that video:



Information Received from Bank A

11. Bank A provided law enforcement with still images of the robbery at the ATM and the white Dodge Charger used by the robbers.² Those images are below.

Digital Video Snapshot

Recorder: MNAT1942A756

Camera Name: 3.1 DU ATM #1 Overview



Capture Size: 352 x 264 pixels

Device Network Name: MNAT1942A756

Device Serial Number: AT1942A756

Device Station ID: 4281

Robbers Holding Brink's Courier A at Gunpoint Near Bank A ATM

² Law enforcement has requested the security footage from Bank A but, as of the submission of this affidavit, has only been provided preliminary still shots from the video depicted herein.

Digital Video Snapshot

Recorder: MNAT1942A756

Camera Name: 3.2 DU ATM #2 Overview



Capture Size: 352 x 264 pixels

Device Network Name: MNAT1942A756

Device Serial Number: AT1942A756

Device Station ID: 4281

Digital Video Snapshot

Recorder: MNAT1942A756

Camera Name: 3.2 DU ATM #2 Overview



Capture Size: 352 x 264 pixels

Device Network Name: MNAT1942A756

Device Serial Number: AT1942A756

Device Station ID: 4281

Images of White Dodge Charger Used as Getaway Vehicle from Robbery

12. Bank A representatives confirmed that at the time of the robbery, Bank A's deposits were insured by the Federal Deposit Insurance Corporation ("FDIC").

CONCLUSION

13. Based on the above information, I respectfully submit that there is probable cause to believe that on or about October 31, 2022, in the Northern District of Illinois, Eastern Division, CORRIE SINGLETON obstructed, delayed, and affected commerce, and the movement of articles and commodities in commerce, by robbery, and committed and threatened physical violence to Brink's Courier A in furtherance of a plan and purpose to rob Brink's Courier A, in violation of Title 18, United States Code, Section 1951(a) and Section 2; and took and carried away money exceeding \$1,000 in value belonging to, and in the care, custody, control, management, and possession of Bank A, namely the United States currency stored in the Bank A ATM located at 16767 Torrence Avenue, Lansing, Illinois, the deposits of which were then

insured by the Federal Deposit Insurance Corporation, and in committing such offense, assaulted a person, namely, Brink's Courier A, in violation of Title 18, United States Code, Section 2113(b) and (d), and Section 2.

FURTHER AFFIANT SAYETH NOT.



Scott Erthal
Special Agent
Federal Bureau of Investigation

SUBSCRIBED AND SWORN to before me
telephonically on November 1, 2022.



Honorable JEFFREY COLE
United States Magistrate Judge